

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

DISABILITY RIGHTS SOUTH CAROLINA;
ABLE SOUTH CAROLINA; AMANDA
McDOUGALD SCOTT, individually and on
behalf of P.S., a minor; MICHELLE FINNEY,
individually and on behalf of M.F., a minor;
LYUDMYLA TSYKALOVA, individually
and on behalf of M.A., a minor; EMILY
POETZ, individually and on behalf of L.P., a
minor; SAMANTHA BOEVERS, individually
and on behalf of P.B., a minor; TIMICIA
GRANT, individually and on behalf of E.G., a
minor; CHRISTINE COPELAND individually
and on behalf of L.C., a minor; HEATHER
PRICE, individually and on behalf of H.P., a
minor; and CATHY LITTLEJOHN,
individually and on behalf of Q.L., a minor,

Plaintiffs,

v.

HENRY McMASTER, in his official capacity
as Governor of the State of South Carolina;
and ALAN WILSON, in his official capacity
as Attorney General of South Carolina;
MOLLY SPEARMAN, in her official capacity
as State Superintendent of Education;
GREENVILLE COUNTY SCHOOL BOARD;
HORRY COUNTY SCHOOL BOARD;
LEXINGTON COUNTY SCHOOL BOARD
ONE; OCONEE COUNTY SCHOOL
BOARD; DORCHESTER COUNTY
SCHOOL BOARD TWO; CHARLESTON
COUNTY SCHOOL BOARD; and PICKENS
COUNTY SCHOOL BOARD,

Defendants.

Civil Action No.: 3:21-cv-2728-JMC

**Governor McMaster's
Local Civil Rule 26.01 Interrogatory
Responses**

Defendant Henry McMaster, in his official capacity as Governor of the State of South Carolina (“Governor McMaster”), by and through the undersigned counsel, and responds to the Interrogatories required by Rule 26.01 of the Local Civil Rules (D.S.C.) as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: At this time, Governor McMaster is not aware of any persons or legal entities that may have a subrogation interest.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiffs have not requested a jury trial, and these claims are not triable by a jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Governor McMaster does not presently object to or challenge the appropriateness of this division pursuant to Rule 3.01 of the Local Civil Rules (D.S.C.).

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge

will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: None.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Governor McMaster is being sued in his official capacity and is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: At this time, Governor McMaster does not contend that some other person or legal entity is liable to him or to Plaintiffs as it relates to this matter.

Respectfully submitted,

s/Wm. Grayson Lambert

Thomas A. Limehouse, Jr. (Fed. Bar No. 12148)

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Senior Legal Counsel

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Columbia, South Carolina